

**SPINELLI, DONALD & NOTT**

A Professional Corporation

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Attorneys for Defendant and Cross-Defendant

WOODSTREAM CORPORATION

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION

CSAA INSURANCE EXCHANGE,

Plaintiffs,

vs.

DYNAMIC SOLUTIONS WORLDWIDE,  
LLC, WOODSTREAM CORPORATION,  
COSTCO WHOLESALE CORPORATON  
and DOES 1 to 20,

Defendants.

Case No.: 2:23-cv-01156-DJC-DMC

**STIPULATION OF DISMISSAL  
WITH PREJUDICE AND ORDER**

Complaint Filed Butte County Superior  
Court: May 15, 2023

COSTCO WHOLESALE CORPORATION,

Cross-Claimant,

vs.

DYNAMIC SOLUTIONS WORLDWIDE,  
LLC, WOODSTREAM CORPORATION,  
and ROES 1-23, inclusive,

Cross-Defendants.

Pursuant to Rule 41(a)(1) of the Federal Rules of Civil Procedure, and for good cause stated herein, the parties stipulate that the Complaint of CSAA Insurance Exchange brought as to Defendants identified as Dynamic Solutions Worldwide, LLC, Woodstream Corporation, and Costco Wholesale Corporation shall be dismissed by the Court, with prejudice. As between Plaintiff and Defendants, they shall bear their own costs and fees associated with this matter including attorney's fees.

As to the cross-claim of Costco Wholesale Corporation against Dynamic Solutions, Worldwide, LLC, and Woodstream Corporation, that action shall be subject to a separate dismissal as those parties are resolving defense and indemnity obligations between themselves.

**IT IS SO STIPULATED.**

DATED: 5/9/24

**THE GRUNSKY LAW FIRM**

/s/Robert E. Wall

Robert E. Wall

Attorneys for Plaintiff,  
CSAA INSURANCE EXCHANGE

DATED: 5/8/24

**MAIRE & DEEDON**

/s/Patrick L. Deedon

Patrick L. Deedon

Attorneys for Defendant/Cross-Claimant,  
COSTCO WHOLESALE CORPORATION

DATED: 5/9/24

**SPINELLI, DONALD & NOTT**

/s/Ross R. Nott

Ross R. Nott

Attorneys for Defendant,  
WOODSTREAM CORPORATION

**ORDER**

It is hereby ordered that Plaintiff CSAA Insurance Exchange's Complaint as to Dynamic Solutions Worldwide, LLC, Woodstream Corporation, and Costco Wholesale Corporation as well as all Does identified therein shall be and are dismissed with prejudice pursuant to the terms set forth herein.

**IT IS SO ORDERED.**

Dated: May 10, 2024

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE